

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

IN RE:

Larry Bonner, Jr

Case No. 25-11401-amc  
Chapter 13

HSBC Bank USA, N.A., as Indenture Trustee for  
the registered Noteholders of Renaissance Home  
Equity Loan Trust 2007-2,  
Movant

vs.

Larry Bonner, Jr ,  
Debtor

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

HSBC Bank USA, N.A., as Indenture Trustee for the registered Noteholders of Renaissance Home Equity Loan Trust 2007-2 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 5), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on April 10, 2025.
2. Movant holds a security interest in the Debtor's real property located at 3624 Fisk Ave, Philadelphia, PA 19129 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on April 10, 2025 (Doc 5).
4. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$807.71, whereas the Plan proposes to

pay only \$0.00.

5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to Debtor's proposed Chapter 13 Plan as Part 4(a) that Movant will not receive any distribution from the Chapter 13 Trustee on its proof of claim.

7. Movant objects to the confirmation of the Debtor's proposed Chapter 13 when no funds are being tendered to Movant. The debtor is bypassing a secured creditor and paying the unsecured claims. Movant objects to this distribution schedule unless its arrears are cured via a loan modification. If a loan modification is not received/obtained before confirmation then any money paid to the Chapter 13 Trustee must be paid to Movant before any unsecured creditors are paid.

8. Movant objects to any plan which proposes to pay it anything less than \$807.71 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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**L.B.F. 9014-4**

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**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on April 18, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: April 18, 2025

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

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